

FCC FORM 481 (July 2016), Line 510
Descriptive Document for Service Quality Standards &
Consumer Protection Rules Compliance
Per Instructions for Completing FCC Form 481

This document details the processes and procedures that Western Wahkiakum County Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protection rules as set forth in the Instructions for completing FCC Form 481. It applies with respect to both the Company's voice telephone service and the Company's broadband service.

For service quality standards that relate to plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as needed.

In addition, Company employees are periodically trained and reviewed on issues involving service quality standards and consumer protection rules, including Identity Theft Prevention (Red Flag) and Consumer Propriety Network Information (CPNI) rules. In particular, if any set of issues appears to be prevalent, employees are given additional training on how to handle such issues.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed. It should be noted that the Company has received no customer complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which are not caused by the Company.

FCC FORM 481 (July 2016), Line 610
Descriptive Document for Functionality in Emergency Situations
Per Instructions for Completing FCC Form 481

At line 600 of FCC Form 481, Western Wahkiakum County Telephone Company (the "Company") certified that it is able to function in emergency situations as set forth in 47 C.F.R. 54.202(a)(2). This means that the Company has a reasonable amount of backup power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement describes how the Company is prepared to provide continued service in an emergency situation and applies with respect to both the Company's voice telephone service and the Company's broadband service.

The Company's network providing voice telephone and broadband service includes two (2) central offices and twenty-two (22) digital loop carrier sites ("DLCs"). The two central offices are equipped with back-up batteries having a capacity to provide reserve power in the event of a power outage for up to approximately eight (8) days, while the DLCs are equipped with batteries having a capacity to provide reserve power in the event of a power outage for up to approximately two (2) days. The Company also maintains fixed back-up power generators at its two central office locations and at the locations of three (3) of its more significant DLCs. There are automatic power transfer switches at each of those five locations, so in the event of a commercial power failure, the transfer to back-up power should occur seamlessly. The Company also maintains three (3) portable generators to be transported to the remaining locations, if needed. All locations are subject to status alarm monitoring that is connected to the Company's principal central office.

The Company has three (3) fiber cable rings that provide redundancy and diversity connecting the Company's principal switching facilities with one another and connecting a number of the remote DLC locations with their serving switching facility. The Company's broadband service also utilizes these fiber cable rings for transmission and benefits from the redundancy and diversity they provide.

Each of the Company's fiber-connected sites has built in redundancy for fiber transceivers. Most of the Company's switching and other electronic/optronic equipment utilized in providing telephone service and broadband service has some redundancy built in, and the Company keeps critical-spares replacement components on hand. The Company also subscribes to support service from the principal vendors of its switching and transmission equipment.

The Company has system redundancy for interexchange access service circuits (including as utilized by its affiliate to provide long distance service), E-911 trunking and SS7 signaling circuits.

Most of the Company's outside plant cable and wire is buried and thus protected from most weather events. The Company's central office switch capacity is engineered to accommodate traffic spikes, and its interexchange facilities also have the capacity to provide additional circuits for interexchange carriers should the need arise. The existing 120 interexchange trunks serving interexchange carriers provide a substantial margin of safety for traffic spikes and may be utilized for the traffic of all interexchange carriers to whom the Company provides switched access service. The middle-mile broadband capacity presently available to the Company substantially exceeds the current busy-period through-put requirements of the Company's

installed broadband service, and thus is believed by the Company to provide adequate reserve capacity for potential broadband traffic spikes.

In the case of isolated groups of customers whose service may suffer impairment due to a cable cut, the Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time, subject to road accessibility and environmental limitations. The Company's emergency service equipment is located within its service area and requires very little time to dispatch.

FCC FORM 481 (July 2016), Line 1010
Descriptive Document for Compliance of Pricing of
Fixed Voice Services with Required Relationship
To Applicable National Average Urban Rate for Voice
Service Benchmark, as required by 47 C.F.R. § 54.313(a)(10)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(10) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that the pricing of the Company's voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 16-362, released April 5, 2016, in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following statements, "Based on the survey results, the 2016 rate floor for voice services is \$21.93, [footnote omitted] and the reasonable comparability benchmark for voice services is \$41.07. [footnote omitted] In addition, each ETC, including competitive ETCs providing fixed voice services, [footnote omitted] must certify in the FCC Form 481 filed no later than July 1, 2016, that the pricing for its *basic residential voice* services is no more than \$41.07. [footnote omitted]" [Italics added.]

It is the Company's understanding that the above-mentioned comparability benchmark includes the recurring residential service rate, any applicable State subscriber line charge rate, any applicable State universal service fund rate, any applicable minimum mandatory Extended Area Service rate, and any applicable Federal subscriber line charge rate.¹

Those components for the Company's basic residential voice telephony service as of June 1, 2016, are as follows:

Recurring residential service rate	\$ 18.00
State subscriber line charge rate	0.00
State universal service fund rate	0.00
Minimum mandatory EAS rate	0.00
Federal subscriber line charge	<u>6.50</u>
Total	\$ 24.50

¹ See Note 5 on the "Data Dictionary" tab of 2016 Results [2016 URS Voice Data.xlsx] located from the FCC webpage having the following URL:

The sum of the above-identified rates (\$24.50) is not more than the voice service comparability benchmark identified in the Public Notice (\$41.07).

FCC FORM 481 (July 2016), Line 1030
Descriptive Document for Compliance of Pricing of
Broadband Services with Required Relationship
To Applicable National Average Urban Rate for Broadband
Service Benchmark, as required by 47 C.F.R. § 54.313(a)(12)
Per Instructions for Completing FCC Form 481

Section 54.313(a)(12) of the rules of the Federal Communications Commission ("FCC") requires any recipient of high-cost support, such as Western Wahkiakum County Telephone Company ("Company"), annually to certify that the pricing of a service that meets the Commission's broadband public interest obligations is no more than the applicable benchmark to be announced annually in a public notice issued by the Wireline Competition Bureau, or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.

The most recent such notice issued by the Wireline Competition Bureau is Public Notice DA 16-362, released April 5, 2016, in WC Docket No. 10-90 ("Public Notice"). That public notice includes the following: "Under the approach adopted by the Bureau in 2014, the reasonable comparability broadband benchmark varies, depending upon the supported service's download and upload bandwidths and usage allowance. [footnote omitted]"

The Public Notice includes a table showing the "benchmark" rate for certain broadband service offerings and provides a URL link to an FCC webpage at which a tool to calculate "benchmarks" for other broadband service offerings may be found. The following table summarizes the broadband service plans offered to consumers by the Company's broadband-providing affiliate and the associated "benchmark," as determined from the Public Notice or the "tool" to which it refers:

Download Speed (Mbps) (up to)	Upload Speed (Mbps) (up to)	Usage Allowance (GB)	Benchmark	Company Affiliate Pricing
1.5	0.768	Unlimited	Not Available	\$29.95
5	1	Unlimited	\$73.26 Not Available	\$49.95
10	1	Unlimited	\$77.80 5.20	\$59.95
30	10	Unlimited	Not Available	\$79.95
70	20	Unlimited	Not Available	\$99.95

As shown in the above table, ~~the each of the two~~ broadband service plans offered to consumers by the Company's affiliate, for which ~~a~~ "benchmark" rates ~~is~~are available, is offered at a price that is below the applicable "benchmark."

FCC FORM 481 (July 2016), Line 1210
Terms and Conditions of Voice Telephone Lifeline Plans
Per Instructions for Completing FCC Form 481

Western Wahkiakum County Telephone Company (the "Company") provides Lifeline service to qualified subscribers throughout the Company's local exchange service area, including in Grays River, Naselle and Rosburg, Washington. Customers may qualify for Lifeline service if certain low-income eligibility requirements are met.

The Company provides flat rate local exchange service to its Lifeline subscribers. It does not offer measured local exchange service or measured Extended Area Service (EAS), so the number of local exchange service and EAS minutes that are provided as part of the Lifeline plan is essentially unlimited. EAS exists between the Company's Grays River and Naselle exchanges.

The company does not provide toll service to its Lifeline subscribers, but does provide access to toll service providers. Company Lifeline subscribers have to choose their own toll service providers. Accordingly, subscribers to the Company's Lifeline service do not incur any Company toll charges, but they may incur toll charges from the toll service providers they select.

Lifeline benefits include credits totaling \$9.25 per month on basic residential voice telephone service. Customers of Wahkiakum West receiving Lifeline credits pay \$16.20 per month for basic telephone service, not including taxes and surcharges.

No Company charges, other than those for the local exchange service and EAS that are included in the Company's Lifeline plan (including the FCC Subscriber Line Charge and E911 charges) are required in order for a qualifying low-income consumer to receive Lifeline service from the Company.



June 1, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 14-58 –
Annual Report due July 1, 2016, FCC Form 481 for
Rate of Return Carriers Receiving High-Cost Support –
47 C.F.R. § 54.313(f)(1)(i) "Milestone Certification"

Dear Ms. Dortch:

In compliance with the filing requirements associated with FCC Form 481 due July 1, 2016,¹ and in compliance with Section 54.313(f)(1) of the Commission's rules, Western Wahkiakum County Telephone Company (Study Area 522451) hereby certifies that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Sincerely,

WESTERN WAHKIAKUM COUNTY TELEPHONE COMPANY

BY

Steven M. Appelo
President

¹ See instructions for Line 3010A – Milestone Certification Requirement, as set forth in Instructions for Completing FCC Form 481, dated November 2015, at page 34.